

Tab 10 to Appendix of Exhibits to Motion of Defendant Brush Wellman, Inc. for Summary Judgment:

CHESMAR AFFIDAVIT

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Suzanne Genereux, et al.,)	
)	
Plaintiff,)	Case No. 04-CV-12137 JLT
)	
v.)	
)	
American Beryllia Corp, et al.)	
)	
Defendant.)	
)	
)	

AFFIDAVIT OF GREG CHESMAR

Greg Chesmar, being first duly sworn, states as follows:

1. I am a former employee of Brush Wellman Inc. ("Brush"). During the period 1980 to 1987, as a Senior Sales Engineer, I was responsible for sales to The Raytheon Corporation in Waltham, MA. I made Brush's sales calls to Raytheon during those years, and recall the products that Brush sold to Raytheon. I have also reviewed records of those sales.

2. Raytheon purchased certain finished beryllium oxide parts from Brush, mostly in the form of rods or tubes. I understand that the plaintiff in this case has testified that she worked with round beryllium oxide "windows" that were approximately 3 inches in diameter. Raytheon did not purchase beryllium oxide parts of that size and shape from Brush.

3. I never saw any sandblasting or gritblasting operations at Raytheon's Waltham facility. In fact, I did not observe any handling of beryllium oxide parts at this facility. My sales calls took place in offices, not on the manufacturing floor. I am not aware of any other Brush employee having observed how Raytheon handled beryllium oxide at this facility.

4. The Raytheon employees with whom I had contact were all aware of the potential toxicity of beryllium oxide, and I understood that Raytheon was being careful to reduce the risk of exposure to beryllium oxide in this facility, but I did not learn or see exactly what Raytheon was doing in this regard, except for a Raytheon Process Specification for cleaning beryllium oxide parts delivered by vendors.



Greg Chesmar

Sworn to and subscribed before me
this 9th day of October, 2006.



Daphne J. Newett
Notary Public

